

IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ALAINA HAMPTON,)	
)	
Plaintiffs,)	
)	Case No. 1:18 CV 2069
v.)	
)	
DEMOCRATIC PARTY OF ILLINOIS,)	
FRIENDS OF MICHAEL J. MADIGAN,)	Judge Sarah Ellis
DEMOCRATIC MAJORITY and 13TH WARD)	
DEMOCRATIC ORGANIZATION,)	
)	
Defendants.)	Magistrate Judge Maria Valdez
)	
)	
)	

**PLAINTIFF’S OBJECTIONS AND ANSWERS
TO DEFENDANTS’ FIRST SET OF INTERROGATORIES**

Plaintiff, Alaina Hampton (“Plaintiff”), by and through her attorneys, for her objections and answers to Defendants’ First Set of Interrogatories, pursuant to Rule 33(b) of the Federal Rules of Civil Procedure, hereby states as follows:

Preliminary Statement

With respect to each answer set forth herein, Plaintiff’s investigation continues and Plaintiff reserves the right to supplement and/or amend any answer as necessary and as additional information is obtained through discovery or otherwise.

General Objections

1. Plaintiff objects to each and every Interrogatory, and to Defendants’ “Definitions” and “Instructions,” to the extent they purport to impose obligations on Plaintiff greater than those contemplated by the Federal Rules of Civil Procedure and the Local Rules of the Northern District of Illinois.

2. Plaintiff objects to Defendants' Interrogatories to the extent they call for confidential information or for information protected by the attorney-client privilege or work product doctrine.

3. Plaintiff's investigation is ongoing. Plaintiff reserves the right to supplement these answers in light of her ongoing investigation.

ANSWERS TO INTERROGATORIES

1. Identify each charge, lawsuit or claim (other than this lawsuit) you have ever filed, brought (individually or jointly) or been a party to, including but not limited to, any suits filed against former employers or entities to whom you provided services under contract or agreement. With regard to each such charge, lawsuit or claim, provide the name of the court or forum, the complete case title and case or docket number, the names of the parties to the litigation or claim, a brief description of the nature of the matter, and a brief summary of the final disposition of the matter.

ANSWER: Plaintiff objects to this Interrogatory on the ground that it is overbroad as it seeks information that is not relevant to any claims or defenses in this case such that the burden of producing the requesting information is outweighed by its value, if any, to the case. Subject to and without waiving the foregoing objection, Plaintiff answers none.

2. For the time period 2012 to the present, identify in chronological order, each position, job or contracted project you have held or been engaged for and for each position, job or contracted project identified, provide the name and address of the employer or contracting entity, the dates/time period of employment or engagement, job title or position (if applicable), duties and responsibilities, compensation received from such employment or engagement, the name of any

supervisor or other individual to whom you reported and the reason(s) for separation or termination of such employment or engagement.

ANSWER: Plaintiff objects to this Interrogatory on the grounds that it is overly broad in both scope and time. Subject to the foregoing objection, Plaintiff answers, to the best of her recollection, as follows:

Longhorn Steakhouse: June 2008 – Feb.2013 (on and off)

Springfield, Illinois

Waitress

Direct Supervisor: Unknown

Compensation: approx. \$4 per hour plus tips

Reason for separation: moved to Chicago to work for Speaker Madigan.

DPI/Democratic Majority: August- Sep. 2012

Field Organizer for State Representative Elect Sue Scherer

Supervisor: Kristin Bauer

Compensation: *see* Plaintiff's document production

Reason for separation: end of election cycle

DPI/Democratic Majority: Oct. 2012 – mid-Nov. 2012

Field Organizer for State Representative Elect Kathleen Willis

Direct Supervisor: Lisbeth Ramirez

Regional Supervisor: 13th Ward Alderman Marty Quinn

Compensation: *see* Plaintiff's document production

Reason for separation: end of election cycle

Ill. House of Reps., Office of the Speaker: March 2013 – Feb. 2014; March– June 2014

21st Illinois House Representative District (Representative Silvana Tabares)

Chicago, Illinois

Program Specialist

Supervisor: 13th Ward Alderman Marty Quinn

Compensation: \$31k per year

Reason for separation: to work on State Representative Candidate Sam Rosenberg's election

DPI/Democratic Majority/Friends of Madigan/Sam Rosenberg for State Rep: Feb.–March 2014

Champaign, Illinois

Campaign Manager for State Representative Candidate Sam Rosenberg

Supervisor: Shaw Decremer

Compensation: *see* Plaintiff's document production

Reason for separation: end of election cycle

The Greenbay Café: Nov. 2014 – 2017 (on and off)

Server

Supervisor: Carla (LNU)

Compensation: approx. \$4 per hour plus tips

DPI/Deb Mell for 33rd Ward Alderman: Dec. 2014 – March 2015

Campaign Manager

Supervisor: Shaw Decremer

Compensation: \$10k

Reason for separation: end of election cycle

Waterhouse Tavern & Grill: April 2015 –present (on and off)

Chicago, Illinois

Server/bartender

Supervisor: Brian Myers

Compensation: approx. \$5 per hour plus tips

Bruno's Restaurant: August –Nov. 2015

Denver, Colorado

Server

Supervisor: Nick (LNU)

Compensation: approx. \$4 per hour plus tips

Reason for separation: moved back to Chicago to work on Juliana Stratton's campaign

Fooducopia: Aug. – Nov. 2015

Denver, Colorado

Server

Supervisor: Tim (LNU)

Compensation: approx. \$5 per hour plus tips

Reason for separation: moved back to Chicago to work on Juliana Stratton's campaign

Friends of Juliana Stratton/DPI: Dec. 2015–March 2016

Chicago, Illinois

Campaign Manager

Supervisor: Alderman Marty Quinn

Compensation: \$2900 per month

Reason for separation: end of election cycle

Chicago Heights Economic Development Corp.: July-Oct. 2016; mid-Nov.-April 2017

Chicago Heights, Illinois

Program Coordinator

Direct Supervisor: Jack Hynes

Compensation: \$51k per year

Reason for separation: leave of absence to work on Deb Conroy's campaign (Oct. 2016) and subsequently she resigned (April 2017)

DPI/Democratic Majority/13th Ward Democratic Org. /Friends of Madigan: June- Nov. 2016

Chicago, Illinois

Field Organizer for Marwig and Cloonen campaigns

Supervisors: 13th Ward Alderman Marty Quinn and Kevin Quinn

Compensation: \$200 per day

Reason for separation: end of campaign cycle

DPI/Democratic Majority/13th Ward Democratic Org. /Friends of Madigan: Oct.-Nov. 2016

Chicago, Illinois

Campaign Advisor for Deb Conroy

Direct Supervisor: 13th Ward Alderman Marty Quinn

Compensation: *see* Plaintiff's document production

Reason for separation: end of campaign cycle

Steger Municipal Election: March – June 2017

Chicago, Illinois

Campaign Manger

Direct Supervisor: David Gonzales

Compensation: \$2000

Reason for separation: end of election

Marie Newman for Congress: April – Aug. 2017

Chicago, Illinois

Campaign Manager

Direct Supervisor: Marie Newman

Compensation: \$7500 per month

Reason for separation: resignation

Friends of Christian Mitchell: Sep. 2017-Jan. 2018

Chicago, Illinois

Field Director for petition process

Direct Supervisor: Christian Mitchell

Compensation: \$2000 per month

Reason for separation: petition process ended

Hampton Moore LLC: Oct. 2017 – 2018

Chicago, Illinois

Co-Founder

Fundraising and political consulting firm for various clients including:

- **Oran F. Whiting for Judge: Nov. 2017**
- **Friends of Holly Kim: Nov. 2017- Jan. 2018**
- **Friends of Curtis Tarver: Sep. 2017 – Feb. 2018**
- **Friends of Bridget Degnen: Nov. 2017- March 2018**
- **Elect Judge Mackoff: Feb. 2018**

Compensation: *see* Plaintiff's document production.

Dan McCready for Congress/North Carolina Democratic Party: Sept. 2018- present
Charlotte, North Carolina
Campaign Manager
Supervisor: Eric Johnson
Compensation: \$6000 per month

3. For each individual or entity with whom you have applied or sought employment or engagement at any time since January 1, 2017, identify the name of the individual or entity with whom you sought employment or an engagement, the date you applied or sought engagement, the position(s) or job(s) for which you applied, and whether you were offered employment or engagement, and, if not, the reason(s) given and by whom.

ANSWER: Plaintiff incorporates her answer to Interrogatory No. 2 herein as if stated in full. Answering further, Plaintiff states, to the best of her recollection, that, between January 1, 2017 and the present, she formally or informally sought employment with the following individuals and/or entities:

Chicago Teacher's Union (CTU):

In or around September 2017, Plaintiff had conversations with D'Javan Conway, a contract lobbyist for CTU, about CTU retaining Plaintiff to work on Johane Strong's Fifth District statement representative campaign. In or around October 2017, Plaintiff had a meeting with Stacy Davis Gates, CTU's political director, Emma Tai of United Working Families and Johane Strong to discuss retaining Plaintiff to assist with the campaign. After the meeting, Plaintiff was led to believe that CTU wanted to work with her and that CTU was in the process of finalizing the employment offer. Approximately one week later, while in Springfield, D'Javan Conway reached out to Plaintiff and asked to meet with her. At the meeting, D'Javan Conway asked Plaintiff if she was "on the outs" with Alderman Marty Quinn as someone had informed Stacey Davis Gates that such was the case. Plaintiff never heard back from CTU, Stacey Davis Gates, Emma Tai and/or Johane Strong after the meeting with D'Javan Conway.

Kristin Crowell Campaign:

Beginning in or around October 2017, Plaintiff had conversations with Kristin Crowell about working with her on her upcoming campaign when she was planning on running for state representative. After numerous conversations in which Plaintiff was led to believe that Crowell was interested in working with Plaintiff, Plaintiff never heard back. In or around April, 2018, Plaintiff learned from Emily Miller that Crowell had been told not to work with Plaintiff.

Kwame Raoul Campaign for Attorney General

In or around October 2017, Plaintiff was offered employment as Deputy Campaign Manager for Kwame Raoul's campaign. Plaintiff was unable to accept the employment offer as she had already committed to working with Curtis Traver's and was also hoping to be hired by Defendants to work on the Fifth District race.

Fifth District Campaign:

In or around November 2017, Plaintiff indicated her desire to work for Defendants and inquired of Heather Weir Vaught about a job opportunity on the then upcoming Fifth District race. Vaught informed Plaintiff that she would set up a meeting between Plaintiff and Alderman Marty Quinn to discuss the job opportunity. Vaught, however, never followed up with Plaintiff. As such, in or around January 2018, Plaintiff contacted Vaught and again inquired about employment with Defendants to work on the Fifth District race. In response, Vaught stated that Defendants would not be getting involved in the Fifth District race and therefore no job opportunity would be available to Plaintiff. Plaintiff learned that Vaught's statement was false and that Defendants were in fact getting involved in the race and hired someone else to work on the Fifth District campaign.

English First

In December, 2017, Plaintiff accepted a position with English First in China. Plaintiff deferred the opportunity and then ultimately had to decline it.

Anti-Harassment, Equality and Access (AHEA) Panel

In or around March 2018 Plaintiff submitted an online application for the panel coordinator position for the AHEA Panel. On or about June 19, 2018, Plaintiff was notified via email that the AHEA Panel had decided to hire another candidate.

Ayanna Pressley Congressional Campaign (Boston, Massachusetts)

In or around April 2018, Plaintiff applied to be the campaign manager for Ayanna Pressley's campaign. Plaintiff interviewed for the position but then never heard back.

Deb Mell Campaign

In or around July 2018, Alderman Mell contacted Plaintiff about employing Plaintiff as her campaign manager. On or about August 6, 2018, Plaintiff met with Alderman Mell to further discuss the job opportunity. During the meeting, Alderman Mell expressed concerns about working with Plaintiff in light of Plaintiff's pending lawsuit against Defendants. Alderman Mell indicated that she was worried that the Defendants would retaliate against her if she hired Plaintiff. Plaintiff never heard back from Alderman Mell after the August 6, 2018 meeting.

Democratic Party of Illinois

On or about July 11, 2018, Plaintiff submitted her resume in consideration for the Executive Director position with the Democratic Party of Illinois. Plaintiff never heard back but learned that the position went to someone else.

UltraViolet

On or about August 10, 2018, Plaintiff applied for the position of associate campaign director. On or about August 15, 2018, Plaintiff was notified by Holly Witherington that she did not get the position and that they were moving forward with a different applicant.

Other Potential Employment Opportunities

In 2018, Hampton Moore LLC sent proposals to various individuals, including Alderman John Arena, Alderman Scott Waguespack, and Alderman Candidate Erika Wozniak, for consulting work. However, neither Plaintiff nor Hampton Moore LLC were engaged to provide consulting services.

Plaintiff's investigation continues.

4. For the time period January 1, 2016 to the present, identify each job or contracted project Hampton Moore LLC has been engaged for and for each job or contracted project identified, provide the name and address of the client or contracting individual/entity, the dates/time period of engagement, the nature of the job, project or engagement, and the income received for each job, project or engagement.

ANSWER: Plaintiff objects to this Interrogatory to the extent it seeks confidential, sensitive and private information about individuals and/or entities who are not parties to the case. Plaintiff also objects on the grounds that it seeks certain information, *i.e.* the address of the client or contracting individual/entity that is not relevant to any issue in the case. Subject to and without waiving the foregoing objections, Plaintiff answers, to the best of her recollection, that Hampton Moore LLC was engaged as follows:

Friends of Curtis Tarver: Sep. 2017 – Feb. 2018

Chicago, Illinois

Nature of Engagement: Consulting

Compensation: \$7500

Oran F. Whiting for Judge: Nov. 2017

Chicago, Illinois

Nature of Engagement: Fundraising Consulting

Compensation: \$2500

Friends of Holly Kim: Nov. 2017- Jan. 2018

Mundelein, Illinois

Nature of Engagement: Consulting/Campaign Work

Compensation: \$2000

Friends of Bridget Degnen: Nov. 2017- March 2018

Chicago, Illinois

Nature of Engagement: Consulting

Compensation: \$16,130.75

Elect Judge Mackoff: Feb. 2018

Chicago, Illinois

Nature of Engagement: Consulting

Compensation: \$1500

Plaintiff's investigation continues.

5. Identify each individual whom you contend to be an agent or representative of any of the Defendant committees who you allege retaliated against you as alleged in the Amended Complaint. For each person identified, provide the date on which such alleged retaliation occurred, a brief description of the conduct alleged to be retaliatory and whether you have any documents supporting or reflecting the information provided in response to this Interrogatory.

ANSWER: Plaintiff objects to this Interrogatory as it calls for a legal conclusion as to whether an individual is an "agent or representative" of the Defendant-committees, and calls for information protected by the work-product doctrine. Plaintiff also objects to this Interrogatory to the extent it seeks information that is within Defendants' possession and control and/or information that Defendants have not yet produced in discovery. At this point in the case, Plaintiff does not have knowledge of every individual who was involved in the alleged discriminatory/retaliatory conduct and/or the decision-making process. Plaintiff also objects to this Interrogatory on the ground that it calls for a narrative response better suited for an oral discovery deposition.

Subject to and without waiving the foregoing objections, based on the information currently available to Plaintiff, and by way of summary only, Plaintiff answers as follows:

Individuals Involved: The following individuals were involved in the unlawful and/or retaliatory conduct alleged in the Complaint: Alderman Marty Quinn, Speaker Michael J. Madigan, Heather Weir Vaught and other agents and/or representatives of the Defendant-committees unknown to Plaintiff as this time.

Summary of Retaliation: Between 2012 and 2017, Plaintiff worked successfully as a political staffer and campaign manager for the Defendant-committees controlled by Speaker Madigan. From Approximately July 2016 through December 2016, Defendants assigned Plaintiff to work on three separate campaigns. Beginning in or around August, 2016, and through February 2017, one of Plaintiff's supervisors, Kevin Quinn, subjected Plaintiff to severe and pervasive sexual harassment by pursuing Plaintiff to have a romantic and sexual relationship with him.

In approximately mid-February 2017, Plaintiff reported Kevin Quinn's sexual advances and harassment to her and Kevin Quinn's supervisor, Alderman Marty Quinn. Alderman Quinn, however, failed to take sufficient corrective or remedial action. Instead, Alderman Quinn informed Plaintiff that she could "block" Kevin Quinn's phone number and that she would no longer be required to report to Kevin Quinn directly. Despite this, however, Alderman Quinn indicated that he wanted Plaintiff's next assignment within the Defendants' organizations to be working as a 13th Ward precinct officer which, however, would require Plaintiff to again work with Kevin Quinn. As a result of Defendants' failure to properly address and rectify the situation, Plaintiff was forced to stop working for Defendants and was constructively discharged.

In November 2017, Plaintiff again reported the sexual harassment/hostile work environment, this time directly to Speaker Madigan. Specifically, on or about November 1, 2017, Plaintiff wrote a letter to Speaker Madigan to explain the circumstances surrounding her departure as she did not believe, based on her conversation with Speaker Madigan on or about April 17, 2017, at a political fundraiser that Plaintiff hosted for Juliana Stratton, that Alderman Quinn had informed Speaker Madigan of what had transpired. Plaintiff contacted Speaker Madigan with the expectation that, once informed of the true circumstances of why she stopped working for the Defendants, Speaker Madigan would allow her to return to work for Defendants on the upcoming Fifth District race in her former role.

Speaker Madigan did not respond to Plaintiff's letter. Instead, on or about November 13, 2017, Defendants' private attorney, Heather Weir Vaught, called Plaintiff and scheduled a meeting with her for November 15, 2017. At the meeting, Plaintiff provided Vaught with hard copies of all of the sexually harassing text messages she received from Kevin Quinn and asked Vaught to share them with Speaker Madigan. Plaintiff also asked Vaught about being hired by the Defendants to work on the upcoming Fifth District campaign as she had done so previously for Juliana Stratton. While Vaught minimized Kevin Quinn's sexual harassment and told Plaintiff she was not sexually harassed or subjected to a sexually hostile work-environment because Plaintiff was not technically an "employee", Vaught promised to arrange for a meeting between Plaintiff and Alderman Quinn to discuss the possibility of Plaintiff working for the Defendants on the upcoming Fifth District race.

On or about December 12, 2017, Plaintiff sent Vaught a text message asking if it was okay if she contact Alderman Quinn directly to discuss assisting him on the Fifth District race, as Vaught had not followed up with Plaintiff as promised during their November 15th

meeting. In response, Vaught told Plaintiff she would call her the next day to discuss it further but she never did.

On or about January 15, 2018, Plaintiff again reached out to Vaught via text message. Vaught responded stating that she would contact Plaintiff later that day but never did. Having not heard back from Vaught, later that day, Plaintiff contacted Alderman Quinn directly regarding opportunities to work for Defendants on upcoming campaigns. Alderman Quinn did not respond. Instead, almost immediately after sending the email, Vaught called Plaintiff and told her that the Defendants would not be hiring her to work on the Fifth District campaign because the Defendants would not be getting involved in that race.

This, however, was untrue as Defendants ultimately hired another individual to work on the Fifth District campaign. Defendants and their agents and representatives, including Speaker Madigan, Alderman Quinn, Heather Weir Vaught and other individuals unknown to Plaintiff at this time, refused to hire Plaintiff to work on the Fifth District race, a job for which she was undeniably qualified for, in retaliation for her reporting Kevin Quinn's sexual harassment and the sexually hostile work environment that she was forced to endure. The stated reasons for Defendants' failure to hire Plaintiff to work on the Fifth District race were pretexts to hide their unlawful employment actions.

Indeed, between February 2017, and February 2018, despite Plaintiff's reports to Speaker Madigan, the Defendants, and Alderman Quinn, Kevin Quinn continued to work in a supervisory capacity for the Defendants. At no time between November 2017, when Vaught first contacted Plaintiff on behalf of the Defendants, and February 2018, when the Defendants terminated Kevin Quinn, did Vaught or the Defendants inform Plaintiff that they were conducting an investigation into her allegations of sexual harassment against Kevin

Quinn. Defendants only terminated Kevin Quinn when they learned that Plaintiff was going public with her allegations.

Additionally, based on information and belief, Defendants retaliated against Plaintiff for reporting and/or complaining of the sexual harassment identified in the Complaint in that they interfered and precluded Plaintiff from obtaining employment with the Chicago Teacher's Union, Kristen Crowell and other individuals and/or entities.

Plaintiff directs Defendants to the documents attached to the Amended Complaint. Answering further, Plaintiff will produce any non-privileged documents in her possession that are responsive to this request. Plaintiff's investigation continues.

6. State each and every fact relating to or supporting your claim that you were constructive (*sic*) discharged as alleged in Paragraph 36 of the Complaint, and identify any documents reflecting the information provided in response to this Interrogatory.

ANSWER: Plaintiff objects to this Interrogatory as it calls for a legal conclusion as to whether she was "constructively discharged" and information protected by the work-product doctrine. Plaintiff also objects to this Interrogatory to the extent it seeks information that Defendants have not yet produced in discovery. Plaintiff also objects to this Interrogatory on the ground that it calls for a narrative response better suited for an oral discovery deposition.

Subject to and without waiving the foregoing objections, Plaintiff states that she was constructively discharged by Defendants as a result of Defendants' failure and/or refusal to take corrective or remedial action after Plaintiff, in February 2017, first reported the sexual harassment/sexually hostile work environment. In fact, Alderman Quinn told Plaintiff that her next assignment within the Defendants' organization would be to work as a precinct

captain which would have required Plaintiff to again work directly with Kevin Quinn, the very supervisor who was sexually harassing Plaintiff. As a result of the Defendants' failure to remedy the situation or take appropriate action, in April, 2017, Plaintiff was forced to stop working for the Defendants because she could no longer suffer the crippling fear and anxiety she experienced having to work with Kevin Quinn.

The Defendants again failed to take corrective or remedial action after Plaintiff directly informed Speaker Madigan of the sexual harassment/hostile work environment identified in the Complaint. Indeed, between February 2017, and February 2018, despite Plaintiff's reports to Speaker Madigan, the Defendants, and Alderman Quinn, Kevin Quinn continued to work in a supervisory capacity for the Defendants. At no time between November 2017, when Vaught first contacted Plaintiff on behalf of the Defendants, and February 2018, when the Defendants terminated Kevin Quinn, did Vaught or the Defendants inform Plaintiff that they were conducting an investigation into her allegations of sexual harassment against Kevin Quinn. Defendants only terminated Kevin Quinn when they learned that Plaintiff was going public with her allegations.

Plaintiff directs Defendants to the documents attached to the Amended Complaint filed in this matter. Answering further, Plaintiff will produce any non-privileged documents in her possession that are responsive to this request. Plaintiff's investigation continues.

7. Do you claim emotional and/or psychological damages as part of your claim? If so, identify the name and contact information for each doctor, psychologist, hospital, clinic, counselor, association, or other professional or medical facility or entity at which or by whom Plaintiff has been or is being treated, counseled, diagnosed, examined, or otherwise provided

assistance for any physical or emotional injury or condition within the relevant time period, the date and/or period of time of such treatment, and a brief description of the nature of such treatment.

ANSWER: Except for health care treatment regarding emotional distress caused by Defendants, Plaintiff objects to this Interrogatory on the grounds that it requests information that is private, confidential and irrelevant for the purposes of this case. Plaintiff further objects to this Interrogatory as it seeks information protected by the doctor-patient privilege. Plaintiff also objects on the grounds that it is overbroad, unduly burdensome and seeks information beyond any reasonable time frame calculated to elicit relevant evidence. As such, the burden of answering this Interrogatory far outweighs any likely benefit and would be disproportionate to the needs of this case.

Without waiving the foregoing objections, Plaintiff answers yes and states, between January 1, 2016 and the present, she received mental health treatment as a result of Defendants' conduct from the following individuals and/or entities:

Carmen Juneidi

Lifespan

70 E. Lake Street, Suite 700

Chicago, Illinois 60601

Began treatment in April 2018

Dr. Peter Newman

405 N Wabash Ave Unit 1814

Chicago, IL 60611

Sought Treatment in August, 2018

Plaintiff's investigation continues.

8. State each and every fact relating to or supporting your claim alleged in Paragraph 51 of the Complaint that "[Defendants] have ignored and/or disregarded other reports of sexual harassment of female employees and volunteers working for the [Defendants]" and identify any documents reflecting the information provided in response to this Interrogatory.

ANSWER: Plaintiff objects to this Interrogatory on the grounds that it calls for a narrative response better suited for an oral discovery deposition. Plaintiff also objects on the grounds that it does not clearly, certainly or specifically identify what information is being sought as it seeks “every fact relating to or supporting” the allegation, which is vague, overly broad, ambiguous, and would require Plaintiff to speculate about the intended meaning of the request. Plaintiff also objects to this Interrogatory on the ground that it seeks information and/or documents that is already in Defendants’ possession, custody and control and information Defendants have not yet produced in discovery.

Subject to and without waiving the foregoing objections, Plaintiff states, by way of summary only, that she came to learn that other females employed by the Speaker had been sexually harassed and/or assaulted by a male co-worker, Travis Shea. Both females reported Travis Shea’s sexual harassment and/or assault directly to attorney Heather Weir Vaught but nothing was done in response. In fact, Mr. Shea remained on the Speaker’s staff for an additional two years thereafter. Plaintiff’s investigation continues.

9. Identify all internet social media and networking websites analog or digital photograph, still image or video sharing websites, and web logs (blogs), internet message boards, chat rooms, or public forums that you have used, posted on, or maintained an account since January 1, 2012. “Internet social media and networking websites” includes but is not limited to Facebook, Facebook Messenger, Twitter, LinkedIn, Instagram, XboxLive, Foursquare, Instagram, Whatsapp, Windows Live Spaces, Pinterest, Google+, Google Hangouts, Tumblr, Flickr, Skype, FaceTime, Snapchat, Reddit, ASKfm and Meetup.

ANSWER: Plaintiff objects to this Interrogatory on the ground that it seeks irrelevant information as Plaintiff’s social media accounts are only relevant if she used them

to post information related to this case. Plaintiff further objects on the grounds that it requests information that invades Plaintiff's privacy. Subject to and without waiving the foregoing objections, Plaintiff has used the following social media accounts between January 1, 2012 and the present: Facebook, Twitter, Instagram, Snapchat, LinkedIn, Pinterest, Skype, and FaceTime.

10. With respect to all internet social media and networking websites, analog or digital photograph, still image or video sharing websites, and web log (blog), internet message board, chat room, or public forums identified in your answer above, provide your current user name, screen name and password. Alternatively, provide a copy of all non-privileged content/data shared on each account that relates to the claims, allegations or defenses in the Amended Complaint.

ANSWER: Plaintiff will produce copies of all non-privileged content/data shared on each account that relates to the claims, allegations or defenses in the Amended Complaint. Plaintiff's investigation continues.

11. Provide email addresses of any email account(s) and phone numbers that you have used or maintained since January 1, 2014.

ANSWER:

Email Accounts: Ahampton789@gmail.com; alaina@hamptonmoore.com

Cell Phone: 217.891.5717

12. For every account identified in Interrogatory 8 above, describe in detail any and all content you have deleted, erased or changed status from visible to non-visible on or after January 1, 2017, including but not limited to tweets, blog entries, photographs, videos, chats, messages, posts, name/username changes to any accounts and the deletion of any accounts.

ANSWER: To the best of Plaintiff's recollection, she did not delete or erase any posts, tweets etc., however, Plaintiff believes that she did make one Facebook post non-visible, but states that said post will be produced to Defendants in discovery. Plaintiff's investigation continues.

13. Identify every personal trip/vacation taken by you since August 1, 2012 through the present and identify date(s)/length of travel identified, location(s) of travel, reason(s) for travel, and whether any documents exist reflecting the information provided in response to this Interrogatory, including its subparts.

ANSWER: Plaintiff objects to this Interrogatory on the ground that it seeks information with no probative value to any disputed factual or legal issue in this case. Accordingly, it follows that the burden of answering this Interrogatory outweighs any likely benefit and would be disproportionate to the needs of this case. In light of the foregoing, Plaintiff declines to answer this Interrogatory.

14. Identify each item of damages you are seeking in this matter and, for each, state the nature of the damages, the amount of the damages; and whether any documents exist reflecting or supporting the information provided in response to this Interrogatory.

ANSWER: Based on information currently available, Plaintiff is seeking damages as follows:

Statutory Compensatory Damages: Pursuant to Title VII, Plaintiff reasonably believes she is entitled to statutory compensatory damages in the amount of \$300,000 (based on the reasonable belief that Defendants' total number of employees, including volunteers, exceeds 500). Documents supporting his belief are exclusively within Defendants' possession and/or control.

Actual Damages: Plaintiff seeks actual damages, in the form of lost wages, in the amount of approximately \$1272.95. This amount is calculated using information from public filings as to the salary paid to Laura Duszynski for her work on the 5th District Race minus monies Plaintiff received during that same time period, *i.e.*, January 31, 2018 through March 30,

2018. Plaintiff seeks additional damages for the emotional harm suffered, including mental anguish, inconvenience and loss of enjoyment of normal life activities, as result of Defendants' misconduct, the exact amount to be determined at trial. Documents supporting Plaintiff's actual damages are within Defendants' possession and/or control, and/or in the possession of third parties, such as Laura Duszynski. Other documents supporting Plaintiff's damages, including medical bills, to the extent available, will be identified and produced.

Equitable Relief: Plaintiff also seeks equitable relief in the form of front pay, in an amount to be calculated based on the date of the verdict and/or reinstatement to a comparable position.

Punitive Damages: Plaintiff seeks punitive damages sufficient to deter and punish the Defendants for their discriminatory/retaliatory misconduct in an amount to be determined by the jury at trial.

Reasonable Attorneys' Fees, Costs and Litigation Expenses: amount to be determined at the conclusion of litigation.

Pre/Post-Litigation Interest: to be determined at trial.

Plaintiff's investigation continues.

15. Identify any and all financial support you have received (or have been promised to receive) from any source whatsoever from January 1, 2017 to the present, including but not limited to litigation funding, and the amount of financial support provided from each source identified.

ANSWER: None.

16. Identify all witnesses whom you will or may call as experts to give opinion testimony in the trial of this matter. For each witness identified, state the substance of the opinions to which he/she is expected to testify and identify any documents containing or relating to his/her conclusions and opinions and considered, used or relied upon by the expert in forming his or her conclusions or opinions or in investigating or considering the matters relating to which he or she was retained.

ANSWER: Plaintiff objects to this Interrogatory to the extent that it seeks information beyond what is required by Rule 26. Subject to and without waiving this

objection, Plaintiff states that she has not yet determined who will be called at trial in this matter but retains the right to disclose such information within the time prescribed by the Court and the Federal Rules. Plaintiff's investigation continues

17. Identify all verbal, written or other statement (s) Plaintiff (or any agent acting on Plaintiff's behalf) has obtained which in any way relates to the claims or defenses in this case.

ANSWER: Plaintiff does not currently possess any written statements related to this case, but if and when she does come into possession of such statements and produces them, that production will serve as the answer to this Interrogatory pursuant to Fed. R. Civ. P. 33(d). As to verbal statements, Plaintiff identifies an audio recording of a telephone conversation between Kevin Quinn and Sarah McKay that took place on February 9, 2018 at approximately 2:45 pm. Plaintiff's investigation continues.

Date: October 12, 2018

Respectfully submitted,
KULWIN, MASCIOPINTO & KULWIN, LLP

/s/ Rachel A. Katz

One of Plaintiff's Attorneys

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VERIFICATION

I, Alaina Hampton declare under penalty of perjury that the foregoing *Answers to Defendants' First Set of Interrogatories* are, to the best of my information and belief, true and correct.

Executed this 12 day of October, 2018.

Alaina Hampton
Alaina Hampton

CERTIFICATE OF SERVICE

I, Rachel A. Katz, an attorney, state that I served the instant and foregoing *Plaintiff's Objections and Answers to Defendants' First Set of Interrogatories* by electronic mail to the attorneys of record below on October 12, 2018.

/s/ Rachel A. Katz

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